

EXHIBIT B

UNITED STATES DISTRICT COURT

United States Courts
Southern District of Texas
FILED

for the

MAY 26 2023

District of _____

Division _____

Nathan Ochsner, Clerk of Court

Larry Bryant

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Texas City ISD

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

23-CV 777

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☐ Yes☒ No

?

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Larry Bryant

Street Address

6806 Anderson St.

City and County

Texas City, TX

State and Zip Code

77591

Telephone Number

409-354-6034

E-mail Address

lar.bry2@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Defendant No. 1

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Texas City ISD

School District

1700 Ninth Ave North

Texas City, TX 77590

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name TCISD - Transportation
 Street Address 199th St. N
 City and County Texas City, TX.
 State and Zip Code 77590
 Telephone Number 409-916-0143

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law (specify the federal law):

Hostile Work environment, harassment, coercion, intimidation



Relevant state law (specify, if known):

Texas Penal Code 42.07 (3-7)



Relevant city or county law (specify, if known):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

☐

Failure to hire me.

☒

Termination of my employment.

☐

Failure to promote me.

☒

Failure to accommodate my disability.

☒

Unequal terms and conditions of my employment.

☒

Retaliation.

☐

Other acts (specify):

humiliation, embarrassment, stress/Anxiety

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

Actually 1st day of employment (10-4-21) to end of employment (9-1-22)

C. I believe that defendant(s) (check one):

☐

is/are still committing these acts against me.

☐

is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

☐

race

☐

color

☐

gender/sex

☒

religion

☐

national origin

☐

age (year of birth)

☐

disability or perceived disability (specify disability)

I advised HR when asked why I did not want

E. The facts of my case are as follows. Attach additional pages if needed.

to ride in the car with said sup.
my answer was a religious + beliefs one
we don't share the same sexual orientation

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

I repeated this again to him in presence of others including police officer.
His response "I will let you ride w/ that one"
He also stated "I was discriminat

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

Ms Tenaz Sept. 18, 2022

- B. The Equal Employment Opportunity Commission (check one):

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on (date)

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☐

60 days or more have elapsed.

☒

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Lost of wages

Job reinstatement

Clear up termination issue

relief as deemed by court

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5/26/2023

Signature of Plaintiff

Printed Name of Plaintiff

Larry Bryant
Larry Bryant

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Affidavit for Religious Beliefs And Moral Standards
of
Churches of Christ

*“ Salute one another with a holy kiss,
the Churches of Christ salute You”
Romans 16:16*

I Larry Bryant firmly believes GOD created only two (2) genders for man-kind to consist of male and female. This constitutes my faith in GOD'S Son Jesus Christ, and the Church, Jesus purchased with his own blood-***The Church of Christ*** as written in the Scriptures.

Being followers of Christ and from His doctrine or teachings, we as Christians are to go into the whole world and teach and preach His Gospel (His death, burial & resurrection) in that whosoever shall believe and be baptized shall be saved, whoso believes not shall be damned.

For the record, I will speak for myself on the following due to my personal involvement with a impending court case. As a member of the Church of Christ, I donot condemn other faiths and beliefs or other social movements as it pertains to gender class, only GOD can and will be the Judge. I do believe I reserve the right to condone or not to condone any religion I feel is not consistent the Christian faith. Just as I realized, I needed to repent of my past sins and be baptized into the LORD'S Church order to please GOD and go to Heaven. My sin of fornication (children out of wed lock), smoking, drinking, drugs, stealing, cussing disrespectful, dishonest, evil thoughts, the list goes on. All was washed by the blood of Jesus in water Baptism. As individuals still lives today the same opportunity remains to repent as GOD has commanded.

Due to my Faith and belief system, I finds it very difficult to be exposed in company with newly development of genders including those that represent the lgbqt community. My most inner self, self respect and dignity would certainly be affected, not withstanding potential scrutiny, misunderstanding, embarrassment, label etc.

I plan to submit more information if deemed necessary!

Thank you!

Larry Bryant

MEMORANDUM FOR ALL EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: THE ATTORNEY GENERAL

SUBJECT: Federal Law Protections for Religious Liberty

The President has instructed me to issue guidance interpreting religious liberty protections in federal law, as appropriate. Exec. Order No. 13798 § 4, 82 Fed. Reg. 21675 (May 4, 2017). Consistent with that instruction, I am issuing this memorandum and appendix to guide all administrative agencies and executive departments in the execution of federal law.

Principles of Religious Liberty

Religious liberty is a foundational principle of enduring importance in America, enshrined in our Constitution and other sources of federal law. As James Madison explained in his Memorial and Remonstrance Against Religious Assessments, the free exercise of religion “is in its nature an unalienable right” because the duty owed to one’s Creator “is precedent, both in order of time and in degree of obligation, to the claims of Civil Society.”¹ Religious liberty is not merely a right to personal religious beliefs or even to worship in a sacred place. It also encompasses religious observance and practice. Except in the narrowest circumstances, no one should be forced to choose between living out his or her faith and complying with the law. Therefore, to the greatest extent practicable and permitted by law, religious observance and practice should be reasonably accommodated in all government activity, including employment, contracting, and programming. The following twenty principles should guide administrative agencies and executive departments in carrying out this task. These principles should be understood and interpreted in light of the legal analysis set forth in the appendix to this memorandum.

1. The freedom of religion is a fundamental right of paramount importance, expressly protected by federal law.

Religious liberty is enshrined in the text of our Constitution and in numerous federal statutes. It encompasses the right of all Americans to exercise their religion freely, without being coerced to join an established church or to satisfy a religious test as a qualification for public office. It also encompasses the right of all Americans to express their religious beliefs, subject to the same narrow limits that apply to all forms of speech. In the United States, the free exercise of religion is not a mere policy preference to be traded against other policy preferences. It is a fundamental right.

¹ James Madison, Memorial and Remonstrance Against Religious Assessments (June 20, 1785), in 5 THE FOUNDERS’ CONSTITUTION 82 (Philip B. Kurland & Ralph Lerner eds., 1987).

Federal Law Protections for Religious Liberty

Page 2

2. The free exercise of religion includes the right to *act or abstain from action* in accordance with one's religious beliefs.

The Free Exercise Clause protects not just the right to believe or the right to worship; it protects the right to perform or abstain from performing certain physical acts in accordance with one's beliefs. Federal statutes, including the Religious Freedom Restoration Act of 1993 ("RFRA"), support that protection, broadly defining the exercise of religion to encompass all aspects of observance and practice, whether or not central to, or required by, a particular religious faith.

3. The freedom of religion extends to persons *and* organizations.

The Free Exercise Clause protects not just persons, but persons collectively exercising their religion through churches or other religious denominations, religious organizations, schools, private associations, and even businesses.

4. Americans do not give up their freedom of religion by participating in the marketplace, partaking of the public square, or interacting with government.

Constitutional protections for religious liberty are not conditioned upon the willingness of a religious person or organization to remain separate from civil society. Although the application of the relevant protections may differ in different contexts, individuals and organizations do not give up their religious-liberty protections by providing or receiving social services, education, or healthcare; by seeking to earn or earning a living; by employing others to do the same; by receiving government grants or contracts; or by otherwise interacting with federal, state, or local governments.

5. Government may not restrict acts or abstentions because of the beliefs they display.

To avoid the very sort of religious persecution and intolerance that led to the founding of the United States, the Free Exercise Clause of the Constitution protects against government actions that target religious conduct. Except in rare circumstances, government may not treat the same conduct as lawful when undertaken for secular reasons but unlawful when undertaken for religious reasons. For example, government may not attempt to target religious persons or conduct by allowing the distribution of political leaflets in a park but forbidding the distribution of religious leaflets in the same park.

6. Government may not target religious individuals or entities for special disabilities based on their religion.

Much as government may not restrict actions only because of religious belief, government may not target persons or individuals because of their religion. Government may not exclude religious organizations as such from secular aid programs, at least when the aid is not being used for explicitly religious activities such as worship or proselytization. For example, the Supreme Court has held that if government provides reimbursement for scrap tires to replace child playground surfaces, it may not deny participation in that program to religious schools. Nor may

Moral Issues Confronting Christians

Homosexuality

INTRODUCTION

1. Homosexuality as an acceptable, alternative lifestyle has become more prevalent...
 - a. Equal rights are being granted to practice and promote the lifestyle
 - b. There are now gay churches, even gay priests and ministers in mainstream denominations
 - c. Cities and vacation resorts often cater to open display of homosexual behavior
2. It is certainly a moral issue that confronts many Christians today...
 - a. Some question whether it is wrong
 - b. Others react in ways unbecoming a Christian

[As with any moral issue, we must look to the Word of God: And so we start by asking...]

I. WHAT DOES THE BIBLE SAY?

A. IN THE PATRIARCHAL AGE...

1. Homosexuality led to the fall of Sodom and Gomorrah
 - a. The people were guilty of a "grave sin" - **Gen 18:20**
 - b. The men of the city, young and old, were involved - **Gen 19:4-5**
 - c. They are later described as "given themselves over to sexual immorality and gone after strange flesh" - **Jude 7**
 2. Does not Ezekiel say their sin was lack of hospitality?
 - a. So say some, based on **Eze 16:49**
 - b. Sodom in Ezekiel 16 is Ammon and Moab, the offshoots from Sodom - **JFB**
 - c. Sodom in Genesis had ceased to exist nearly 1500 years before!
- **Homosexual conduct was a grave sin in the days of the patriarchs**

B. IN THE MOSAIC AGE...

1. The Law of Moses made it a capital crime
 - a. It was an abomination, together with bestiality - **Lev 18:22-23**
 - b. It was a reason the other nations were driven out - **Lev 18:24-25**
 - c. The Israelites were warned the same could happen to them - **Lev 18:26-30**
 - d. It was a sin punishable by death - **Lev 20:13**
 2. Remember, Jesus lived under the Law of Moses
 - a. It did not end until His death on the cross - **Col 2:14**
 - b. While in force, Jesus taught strict observance of the Law - **Mt 5:17-19**
 - c. Thus Jesus approved of what the Law taught about homosexuality
- **Homosexual conduct was a capital crime under the Law of Moses**

C. IN THE CHRISTIAN AGE...

1. As written to the Christians in Rome - **Ro 1:24-27**
 - a. Lesbianism and homosexuality both described as "vile passions"
 - b. The former is "against nature", the later is "shameful"
 - c. Men receiving in themselves the penalty of their error (e.g., AIDS?)

1 Cor

6:9

Bible



Enter Reference or Keyword

Bible



NIV NLT ESV BSB KJV NKJ NAS AMP CSB HCS CEV GNT ARA ASV

Parallel Sermons Audio Visuals Comment Interlin Greek Lexicon

SUM OUT TIM TOP BBB PCH PSB TSK LIB ABP HEB

[Bible](#) > [1 Corinthians](#) > [Chapter 6](#) > Verse 9

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◀ 1 Corinthians 6:9 ▶

[Context](#) [Crossref](#) [Comment](#) [Greek](#)

[Verse](#) (Click for Chapter)

[New International Version](#)

Or do you not know that wrongdoers will not inherit the kingdom of God? Do not be deceived: Neither the sexually immoral nor idolaters nor adulterers nor men who have sex with men

[New Living Translation](#)

Don't you realize that those who do wrong will not inherit the Kingdom of God? Don't fool yourselves. Those who indulge in sexual sin, or who worship idols, or commit adultery, or are male prostitutes, or practice homosexuality,

[English Standard Version](#)

Or do you not know that the unrighteous will not inherit the kingdom of God? Do not be deceived: neither the sexually immoral, nor idolaters, nor adulterers, nor men who practice homosexuality,

[Berean Standard Bible](#)

Do you not know that the wicked will not inherit the kingdom of God? Do not be deceived: Neither the sexually immoral, nor idolaters, nor adulterers, nor men who submit to or perform homosexual acts,

[Berean Literal Bible](#)

Or do you not know that *the* unrighteous ones will not inherit *the* kingdom of God? Do not be deceived: neither the sexually immoral, nor idolaters, nor adulterers, nor effeminate, nor homosexuals,

[King James Bible](#)

Know ye not that the unrighteous shall not inherit the kingdom of God? Be not deceived: neither fornicators, ne[ⓧ] idolaters, nor adulterers, nor effeminate, nor abusers of themselves with mankind.

New American Standard Bible

Or do you not know that the unrighteous will not inherit the kingdom of God? Do not be deceived; neither the sexually immoral, nor idolaters, nor adulterers, nor homosexuals,

NASB 1995

Or do you not know that the unrighteous will not inherit the kingdom of God? Do not be deceived; neither fornicators, nor idolaters, nor adulterers, nor effeminate, nor homosexuals,

NASB 1977

Or do you not know that the unrighteous shall not inherit the kingdom of God? Do not be deceived; neither fornicators, nor idolaters, nor adulterers, nor effeminate, nor homosexuals,

Legacy Standard Bible

Or do you not know that the unrighteous will not inherit the kingdom of God? Do not be deceived; neither *the* sexually immoral, nor idolaters, nor adulterers, nor effeminate, nor homosexuals,

Amplified Bible

Do you not know that the unrighteous will not inherit *or* have any share in the kingdom of God? Do not be deceived; neither the sexually immoral, nor idolaters, nor adulterers, nor (perversely) effeminate, nor homosexuals,

Christian Standard Bible

Don't you know that the unrighteous will not inherit God's kingdom? Do not be deceived: No sexually immoral people, idolaters, adulterers, or males who have sex with males,

Holman Christian Standard Bible

Don't you know that the unrighteous will not inherit God's kingdom? Do not be deceived: No sexually immoral people, idolaters, adulterers, or anyone practicing homosexuality,

American Standard Version

Or know ye not that the unrighteous shall not inherit the kingdom of God? Be not deceived: neither fornicators, nor idolaters, nor adulterers, nor effeminate, nor abusers of themselves with men,

Aramaic Bible in Plain English

Or do you not know that evil men do not inherit The Kingdom of God? Do not be deceived; no fornicators, neither worshippers of idols, neither adulterers, neither sexual molesters, neither males lying down with males,

Contemporary English Version

Don't you know that evil people won't have a share in the blessings of God's kingdom? Don't fool yourselves! No one who is immoral or worships idols or is unfaithful in marriage or is a pervert or behaves like a homosexual

Douay-Rheims Bible

Know you not that the unjust shall not possess the kingdom of God? Do not err: neither fornicators, nor idolaters, nor adulterers,

English Revised Version

Or know ye not that the unrighteous shall not inherit the kingdom of God? Be not deceived: neither fornicators, nor idolaters, nor adulterers, nor effeminate, nor abusers of themselves with men,

Surely you know that the wicked will not possess God's Kingdom. Do not fool yourselves; people who are immoral or who worship idols or are adulterers or homosexual perverts

International Standard Version

You know that wicked people will not inherit the kingdom of God, don't you? Stop deceiving yourselves! Sexually immoral people, idolaters, adulterers, male prostitutes, homosexuals,

Literal Standard Version

Have you not known that the unrighteous will not inherit the Kingdom of God? Do not be led astray; neither whoremongers, nor idolaters, nor adulterers, nor effeminate, nor sodomites,

Majority Standard Bible

Do you not know that the wicked will not inherit the kingdom of God? Do not be deceived: Neither the sexually immoral, nor idolaters, nor adulterers, nor men who submit to or perform homosexual acts,

New American Bible

Do you not know that the unjust will not inherit the kingdom of God? Do not be deceived; neither fornicators nor idolaters nor adulterers nor boy prostitutes nor sodomites

NET Bible

Do you not know that the unrighteous will not inherit the kingdom of God? Do not be deceived! The sexually immoral, idolaters, adulterers, passive homosexual partners, practicing homosexuals,

New Revised Standard Version

Do you not know that wrongdoers will not inherit the kingdom of God? Do not be deceived! Fornicators, idolaters, adulterers, male prostitutes, sodomites,

New Heart English Bible

Or do you not know that the unrighteous will not inherit the Kingdom of God? Do not be deceived. Neither the sexually immoral, nor idolaters, nor adulterers, nor effeminate, nor men who have sexual relations with men,

Webster's Bible Translation

Know ye not that the unrighteous shall not inherit the kingdom of God? Be not deceived; neither fornicators, nor idolaters, nor adulterers, nor effeminate, nor abusers of themselves with mankind,

Weymouth New Testament

Do you not know that unrighteous men will not inherit God's Kingdom? Cherish no delusion here. Neither fornicators, nor idolaters, nor adulterers, nor any who are guilty of unnatural crime,

World English Bible

Or don't you know that the unrighteous will not inherit God's Kingdom? Don't be deceived. Neither the sexually immoral, nor idolaters, nor adulterers, nor male prostitutes, nor homosexuals,

Young's Literal Translation

have ye not known that the unrighteous the reign of God shall not inherit? be not led astray; neither whoremongers, nor idolaters, nor adulterers, nor effeminate, nor sodomites,

Additional Translations ...

Context



Berean Standard Bible · Download

Cross References

Leviticus 18:20

You must not lie carnally with your neighbor's wife and thus defile yourself with her.

Deuteronomy 22:22

If a man is found lying with another man's wife, both the man who slept with her and the woman must die. You must purge the evil from Israel.

Proverbs 7:27

Her house is the road to Sheol, descending to the chambers of death.

Ezekiel 18:11

though the father has done none of them: Indeed, the son eats at the mountain and defiles his neighbor's wife.

Luke 21:8

Jesus answered, "See to it that you are not deceived. For many will come in My name, claiming, 'I am He,' and, 'The time is near.' Do not follow them.

Acts 20:32

And now I commit you to God and to the word of His grace, which can build you up and give you an inheritance among all who are sanctified.

1 Corinthians 5:11

But now I am writing you not to associate with anyone who claims to be a brother but is sexually immoral or greedy, an idolater or a verbal abuser, a drunkard or a swindler. With such a man do not even eat.

Treasury of Scripture

Know you not that the unrighteous shall not inherit the kingdom of God? Be not deceived: neither fornicators, nor idolaters, nor adulterers, nor effeminate, nor abusers of themselves with mankind,

Know.

1 Corinthians 6:2,3,15,16,19

Do ye not know that the saints shall judge the world? and if the world shall be judged by you, are ye unworthy to judge the smallest matters? ...

1 Corinthians 3:16

Know ye not that ye are the temple of God, and *that* the Spirit of God dwelleth in you?

1 Corinthians 9:24

Know ye not that they which run in a race run all, but one receiveth the prize? So run, that ye may obtain.

unrighteous.

Exodus 23:1



church of christ



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Homosexuality, Adultery and Cohabitation

Statement of Faith

Statement of Beliefs

Homosexuality, Adultery & ...

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Mt Orab Church of Christ believes that the Bible is God's Word and our final source of authority in doctrine and practice. God's design, from the very beginning of creation as discovered in the Bible, is that sexual relations are to be enjoyed within the boundary of a committed marriage relationship

Explore

Abortion

Alcohol